

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN**

In re)
CITY OF DETROIT, MICHIGAN,) Chapter 9
Debtor.) Case No. 13-53846
) Hon. Steven W. Rhodes
)

**AMENDMENT TO “CONSOLIDATED OBJECTION OF THE RETIREES
ASSOCIATION PARTIES TO THE MOTION OF DEBTOR FOR AN
ENTRY OF AN ORDER (I) AUTHORIZING THE ASSUMPTION OF
THAT CERTAIN FORBEARANCE AND OPTIONAL TERMINATION
AGREEMENT PURSUANT TO SECTION 365(a) OF THE BANKRUPTCY
CODE, (II) APPROVING SUCH AGREEMENT PURSUANT TO RULE
9019, AND (III) GRANTING RELATED RELIEF” [DKT. 329]**

The Retired Detroit Police & Fire Fighters Association (“RDPFFA”), Donald Taylor, individually and as President of the RDPFFA, the Detroit Retired City Employees Association (“DRCEA”), and Shirley V. Lightsey, individually and as President of the DRCEA (collectively “Retiree Association Parties”) through their counsel, Lippitt O’Keefe, PLLC and Silverman & Morris, P.L.L.C., submit the following Amendment to Consolidated Objection of The Retirees Association Parties to the Motion Of Debtor for an Entry of an Order (I) Authorizing the Assumption of that Certain Forbearance and Optional Termination Agreement Pursuant to Section 365(a) of The Bankruptcy Code, (II) Approving

Such Agreement Pursuant to Rule 9019, and (III) Granting Related Relief (“Amended Objection”).

1. This Amended Objection does not alter the Retiree Association Parties’ assertion that “the City has failed to provide sufficient information to establish that assumption of the Forbearance Agreement (as that term is defined in the Settlement Motion) or approval of the settlement contained therein is in the best interest of the City and its creditors.” (Dkt. 329, ¶ 1).
2. The Retiree Association Parties requested in their Objection that the Official Committee of Retirees be permitted time to object to the Debtor’s Settlement Motion. (Dkt. 329, ¶ 2).
3. The Official Committee of Retirees has filed an objection to the Settlement Motion [Dkt. 874].
4. The Retiree Association Parties hereby concur in the Objection of the Official Committee of Retirees [Dkt 874] and hereby incorporates the Objection of the Official Committee of Retirees into this Amended Objection as if fully restated herein.
5. To the extent that the Objection of EEPK [Dkt. 246] and the Objection of the Official Retiree Committee [Dkt. 874] conflict, the Retiree Association Parties withdraw their concurrence with the Objection of EEPK.

WHEREFORE, the Retiree Association Parties request that the Court withhold approval of the Settlement Motion and grant such other and further relief as the Court deems just and proper.

Dated: September 27, 2013

Lippitt O'Keefe, PLLC

/s/ Ryan C. Plecha
Brian D. O'Keefe (P39603)
Ryan C. Plecha (P71957)
Counsel for Retiree Association Parties
370 East Maple Road, 3rd Floor
Birmingham, Michigan 48009
(248) 646-8292
rplecha@lippittokeefe.com

SILVERMAN & MORRIS, P.L.L.C.
Thomas R. Morris (P39141)
Co-Counsel Retiree Association Parties
30500 Northwestern Hwy, Suite 200
Farmington Hills, Michigan 48334
(248) 539-1330
morris@silvermanmorris.com